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2019 FEB 15 PM 1:56
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2019 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDISSON WILSON MERO CASTRO,
TONY ALEX Y MERO CHILAN, and
WILSON JEFFERSON MERO ARCENTALES,

Defendants.

CR No.

I N D I C T M E N T

[46 U.S.C. § 70506(b): Conspiracy to Possess with Intent to Distribute Cocaine and to Destroy Property Subject to Forfeiture on Board a Vessel Subject to United States Jurisdiction; 46 U.S.C. §§ 70503(a)(1), 70506(a), 21 U.S.C. § 960(b)(1)(B)(ii): Possession with Intent to Distribute Cocaine on Board a Vessel Subject to United States Jurisdiction; 46 U.S.C. § 70503(a)(2): Attempting to Destroy Property Subject to Forfeiture on Board a Vessel Subject to United States Jurisdiction; 18 U.S.C. § 2(a): Aiding and Abetting]

The Grand Jury charges:

COUNT ONE

[46 U.S.C. § 70506(b)]

A. OBJECTS OF THE CONSPIRACY

1. Beginning on a date unknown, and continuing to on or about February 2, 2019, within the extraterritorial jurisdiction of the

1 United States, and elsewhere, defendants EDISSON WILSON MERO CASTRO
2 ("E. MERO"), TONY ALEX Y MERO CHILAN ("T. MERO"), and WILSON JEFFERSON
3 MERO ARCENTALES ("W. MERO"), and others known and unknown to the
4 Grand Jury, conspired and agreed with each other to:

5 a. knowingly and intentionally possess with intent to
6 distribute at least five kilograms of a mixture and substance
7 containing a detectable amount of cocaine, a Schedule II narcotic
8 drug controlled substance, on board a vessel subject to the
9 jurisdiction of the United States, in violation of Title 46, United
10 States Code, Sections 70503(a)(1) and 70506(a), and Title 21, United
11 States Code, Section 960(b)(1)(B)(ii); and

12 b. knowingly and intentionally destroy property subject
13 to forfeiture under section 511(a) of the Comprehensive Drug Abuse
14 Prevention and Control Act of 1970, while on board a vessel subject
15 to the jurisdiction of the United States, in violation of Title 46,
16 United States Code, Sections 70503(a)(2).

17 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
18 ACCOMPLISHED

19 2. The objects of the conspiracy were to be accomplished, in
20 substance, as follows:

21 a. Unindicted co-conspirators would arrange for the
22 transportation of quantities of cocaine exceeding five kilograms on a
23 "go-fast" vessel from South America to a destination in North
24 America.

25 b. Defendants E. MERO, T. MERO, and W. MERO would
26 transport the cocaine on a "go-fast" vessel from South America to a
27 destination in North America.

1 c. Upon reaching its destination in North America, the
2 cocaine shipment would be offloaded by unindicted co-conspirators for
3 distribution in North America and elsewhere.

4 d. If defendants E. MERO, T. MERO, and W. MERO
5 encountered the United States Coast Guard before reaching their
6 destination, they would destroy the cocaine by jettisoning it.

7 C. OVERT ACTS

8 3. On or about the following dates, in furtherance of the
9 conspiracy, and to accomplish its objects, defendants E. MERO, T.
10 MERO, and W. MERO, together with others known and unknown to the
11 Grand Jury, committed and caused to be committed various overt acts,
12 in the extraterritorial jurisdiction of the United States, including,
13 but not limited to, the following:

14 Overt Act No. 1: On or before February 2, 2019, unindicted
15 co-conspirators arranged to transport cocaine on a go-fast vessel
16 from South America to a destination in North America.

17 Overt Act No. 2: On or before February 2, 2019, defendants E.
18 MERO, T. MERO, and W. MERO agreed to transport the cocaine on behalf
19 of the unindicted co-conspirators.

20 Overt Act No. 3: On February 2, 2019, defendants E. MERO, T.
21 MERO, and W. MERO possessed approximately one metric ton of cocaine
22 on board a go-fast vessel.

23 Overt Act No. 4: On February 2, 2019, defendants E. MERO, T.
24 MERO, and W. MERO attempted to destroy the metric ton of cocaine to
25 prevent its seizure by the United States Coast Guard by jettisoning
26 the cocaine from the go-fast vessel.

COUNT TWO

[46 U.S.C. §§ 70503(a)(1), 70506(a); 21 U.S.C. § 960(b)(1)(B)(ii);
18 U.S.C. § 2(a)]

On or about February 2, 2019, within the extraterritorial jurisdiction of the United States, and elsewhere, defendants EDISSON WILSON MERO CASTRO, TONY ALEXY MERO CHILAN, and WILSON JEFFERSON MERO ARCENTALES, each aiding and abetting the others, knowingly and intentionally possessed with intent to distribute at least five kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, on board a vessel subject to the jurisdiction of the United States.

COUNT THREE

[46 U.S.C. § 70503(a)(2); 18 U.S.C. § 2(a)]

On or about February 2, 2019, within the extraterritorial jurisdiction of the United States, and elsewhere, defendants EDISSON WILSON MERO CASTRO, TONY ALEXY MERO CHILAN, and WILSON JEFFERSON MERO ARCENTALES, each aiding and abetting the others, knowingly and intentionally attempted to destroy property subject to forfeiture under section 511(a) of the Comprehensive Drug Abuse Prevention and Control Act of 1970, specifically, controlled substances that had been manufactured, distributed, acquired, and possessed in violation

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1 of subchapter I of Title 21 of the United States Code, while on board
2 a vessel subject to the jurisdiction of the United States.

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4 A TRUE BILL

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7 Foreperson

8 NICOLA T. HANNA
9 United States Attorney

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11 LAWRENCE S. MIDDLETON
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13 KEVIN M. LALLY
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